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Hearing Date: April 5, 2016
Time: 10:00 AM

Objections Due: March 29, 2016
Time: 4:00 PM

*Attorneys for Irving H. Picard, Trustee for the
Substantively Consolidated SIPA Liquidation of
Bernard L. Madoff Investment Securities LLC
and the Estate of Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA Liquidation

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

**NOTICE OF TRUSTEE'S MOTION FOR ORDER AMENDING
SCHEDULE OF LITIGATION OF PROFIT WITHDRAWAL ISSUE**

PLEASE TAKE NOTICE that Irving H. Picard, trustee ("Trustee") for the
substantively consolidated liquidation of the business of Bernard L. Madoff Investment
Securities LLC ("BLMIS") under the Securities Investor Protection Act, 15 U.S.C. § 78aaa *et*

seq. (“SIPA”), and the estate of Bernard L. Madoff (“Madoff”), will move this Court for an order amending the schedule of litigation of the profit withdrawal issue (the “Motion”).

PLEASE TAKE FURTHER NOTICE that written objections to the Motion and any opposing affidavits must be filed with the Clerk of the United States Bankruptcy Court, the Alexander Hamilton Customs House, One Bowling Green, New York, New York 10004 by no later than 4:00 p.m., on March 29, 2016 (with a courtesy copy delivered to the Chambers of the Honorable Stuart M. Bernstein) and must be served upon (a) Baker & Hostetler, LLP, counsel for the Trustee, 45 Rockefeller Plaza, New York, New York 10111, Attn: David J. Sheehan, Esq. and (b) the Securities Investor Protection Corporation, 1667 K Street, NW, Suite 1000, Washington, DC 20006-1620, Attn: Kevin H. Bell, Esq. so as to be received on or before March 29, 2016. Any objection must specifically state the interest that the objecting party has in these proceedings and the basis of the objection to the Motion.

PLEASE TAKE FURTHER NOTICE that a hearing on this Motion is scheduled for **April 5, 2016, at 10:00 a.m.** before the Honorable Stuart M. Bernstein, United States Bankruptcy Judge, at the United States Bankruptcy Court, the Alexander Hamilton Customs House, One Bowling Green, New York, New York 10004 or such other time as the Court determines. However, if no objection to the Motion is filed and served in accordance with the requirements of this notice, the Court may enter an order granting the requested relief without holding a hearing under Local Bankruptcy Rule 9075-2.

PLEASE TAKE FURTHER NOTICE that notice of this Motion will be provided by U.S. Mail, postage prepaid, or by email, to: (i) Participating Claimants, through their counsel, Chaitman LLP and Baker & McKenzie LLP; or directly, to the *pro se* Participating Claimant, Margery D. Katz; (ii) all parties on the Master Service List; (iii) the SEC; (iv) the IRS; (v) the

United States Attorney for the Southern District of New York; and (vi) SIPC, pursuant to the Order Establishing Notice Procedures, ECF No. 4560. The Trustee submits that no other or further notice is required.

Dated: New York, New York
March 14, 2016

Respectfully submitted,

BAKER & HOSTETLER LLP

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